

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

DR. RABBI K. A. ISRAEL, CONSULAR ATTY.,  
THE BROTHER OF, AND GUARDIAN FOR,  
MS. BEATRICE DEMETRICE GARTH,

PLAINTIFF

VS.

THOMAS MARTIN LAKE, ATTORNEY AT LAW, AND  
THE INSURERS OF THOMAS M. LAKE,

DEFENDANT

NOV 30 2007

11-30-2007

MICHAEL W. DOBBINS  
CLERK U.S. DISTRICT COURT

CASE NO. 07-CV-6609

HON. JUDGE JOAN H. LEFKOW,  
PRESIDING,

HON. MAG. JUDGE MASON,  
MAGISTRATE JUDGE,

NOTICE OF MOTION

TO: THOMAS MARTIN LAKE, ATTY. AT LAW,  
& THE INSURERS OF THOMAS M. LAKE,  
100 EAST COOK AVENUE, 2ND. FLOOR,  
LIBERTYVILLE, ILLINOIS, 60048

THOMAS M. LAKE ATTY. AT LAW,  
THE INSURERS OF THOM. M. LAKE,  
30 NO. LASALLE ST., STE. 2800,  
CHICAGO, ILLINOIS, 60602

On DECEMBER 11, 2007, at 9:00 a.m. / p.m. or as soon thereafter as

counsel may be heard, I shall appear before the Honorable JUDGE JOAN H. LEFKOW, in

Courtroom 1925 at the United States District Court Northern District of Illinois, Eastern Division,

219 South Dearborn Street, Chicago, Illinois, and present PLAINTIFF'S MOTION TO CORRECT  
CLERICAL MISTAKES IN THE COURT'S DOCKET IN ACCORDANCE WITH THE

ORIGINAL 'CASE-CAPTION' AND 'CIVIL-COVERSHEET' UNDER, AND PURSUANT  
TO F.R.C.P. 60(a); CLERICAL MISTAKES." DR. RABBI K. A. ISRAEL,

Address P.O. BOX 803241,

City / Zip CHICAGO, ILLINOIS, 60680-3241

Telephone (773)-469-8132

PROOF OF SERVICE

I, the undersigned (plaintiff / defendant), certify that on the 30 day of NOVEMBER, 2007,

I served a copy of this notice to each person whom it is directed by way of CERTIFIED MAIL, VIA  
CARDISS COLLINS POST-OFFICE, LOOP POST-OFFICE, BEFORE 5:00 P.M..

DR. Rabbi K. A. Israel  
SIGNATURE / CERTIFICATION

NOVEMBER 30, 2007

07C 6609

07C 6609 JUDGE JOAN H. LEFKOW

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION

DR. RABBI K. A. ISRAEL, CONSULAR ATTY.,  
BROTHER OF, AND THE GUARDIAN FOR,  
MS. BEATRICE DEMETRICE GARTH,  
P.O. BOX 803241,  
CHICAGO, ILLINOIS, 60680-3241  
TELE.#: (773)-469-8132

PLAINTIFF,

VERSUS **JUDGE JOAN H. LEFKOW**

THOMAS M. LAKE, ATTORNEY AT LAW,  
100 EAST COOK AVENUE, 2ND. FLOOR,  
LIBERTYVILLE, ILLINOIS, 60048  
TELE. #: (847)-362-5385

DEFENDANT,

AND THE INSURERS OF  
THOMAS MARTIN LAKE, ATTORNEY AT LAW,  
30 NO. LASALLE STREET, SUITE 2800,  
CHICAGO, ILLINOIS, 60602  
TELEPHONE: (312)-263-6300

DEFENDANT,

RECEIVED

NOV 26 2007

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

JURY TRIAL DEMANDED UNDER, AND  
PURSUANT TO, F.R.C.P. (38): JURY TRIAL  
OF RIGHT; (a), (b), (c) AND  
F.R.C.P. (40): ASSIGNMENT OF CASES FOR  
TRIAL, AND THE SEVENTH AMENDMENT TO THE  
CONSTITUTION OF THE UNITED STATES OF  
AMERICA, ET AL..

MAGISTRATE JUDGE MASON

COMPLAINT FOR VIOLATIONS  
OF 42 U.S.C. ss 1983, AND  
A.B.A. MODEL RULES OF  
PROF. CONDUCT, RULE(S):  
3.7(a); MIS-APPROPRIATION,  
TITLE 42, CHAPTER (21),  
SUBCH. (J), ss 1985;  
PARA. (2): OBSTRUCTING  
JUSTICE, AND INTIMIDATING  
PARTY AND WITNESS, ET AL.,  
SUPL COURT OF ILL. RULES  
OF PROF. CONDUCT:  
RULE 8.4; MISCONDUCT:  
8.4(a)(1), (a)(2), (a)(3),  
(a)(4), (a)(5), (9)(A) ET AL.,

CIVIL ACTION NO.:

HON. JUDGE: **JUDGE JOAN H. LEFKOW**

MAGISTRATE JUDGE MASON  
HON. MAG. JUDGE:

DAMAGES CLAIMED: \$2,777,000.00  
TWO-MILLION-SEVEN-HUNDRED  
AND SEVENTY-SEVEN  
THOUSAND DOLLARS;  
U.S. CURRENCY.

DISTRICT COURT JURISDICTION:  
28 U.S.C. ss 1343(a)(1),  
(a)(2), (a)(3), (a)(4);  
CIVIL RIGHTS & ELECTIVE  
FRANCHISE,

ARTICLE (III): ss (1) & (2),  
ARTICLE (IV) ss (1) & (2),  
ART. (VI): PARA. (2) & (3),  
AND AMENDMENT(S) (I), (IV),  
(V), (VI), (VII), (VIII),  
(IX), (X), (XIV): ss (1),  
& (XV) OF THE U.S. CONST.,  
& 28 U.S.C. ss 1331, 1332  
VENUE: 28 U.S.C. ss 1391a-c.

1-14.

MAGISTRATE JUDGE MASON

JUDGE JOAN H. LEFKOW

## CIVIL COVER SHEET

The civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

(a) PLAINTIFFS DR. RABBI K. A. ISRAEL,  
THE BROTHER OF, AND GUARDIAN FOR,  
MS. BEATRICE DEMETRICE GARTH,

DEFENDANTS : THOMAS MARTIN LAKE,  
ATTORNEY AT LAW, AND THE  
INSURERS OF THOMAS M. LAKE,

(b) County of Residence of First Listed Plaintiff COUNTY OF COOK,  
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant COUNTY OF COOK,  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

07C 6609

(c) Attorney's (Firm Name, Address, and Telephone Number)  
PARALEGALS FOR CIVIL RIGHTS & HUMAN  
RIGHTS, INTERNATIONALE,

Attorneys (If Known)  
OF COUNSEL: JOHN M. BURKE,

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☒ 1 ☒ 1 Incorporated or Principal Place of Business in This State ☐ 4 ☐ 4
- Citizen of Another State ☐ 2 ☐ 2 Incorporated and Principal Place of Business in Another State ☐ 5 ☐ 5
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 ☐ 6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (excl. vet.) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Inj.	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury--Med. Malpractice <input type="checkbox"/> 365 Personal Injury--Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Theft in Land <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input checked="" type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input checked="" type="checkbox"/> 410 Antitrust <b>XX</b> <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Security/Commodity/Exch. <input type="checkbox"/> 875 Consumer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 ADA—Employment <input type="checkbox"/> 446 ADA—Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSI/D Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

## V. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

## VI. CAUSE OF ACTION (Enter U.S. Civil Statute under which you are filing and write a brief statement of cause.)

TITLE 15 CHAP. (1), ss (13)(a), (13)(b),  
& ss (15)(a), ET AL., DISCRIMIN. IN SERV.

## VII. PREVIOUS BANKRUPTCY MATTERS (For nature of suit 422 and 423, enter the case number and judge for any associated bankruptcy matter previously adjudicated by a judge of this Court. Use a separate attachment if necessary)

VIII. REQUESTED IN COMPLAINT: ☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ \$52,777,000.00

CHECK YES only if demanded in complaint:  
JURY DEMAND: ☒ Yes ☐ No

IX. This case ☒ XXXX is not a refiling of a previously dismissed action.

☐ is a refiling of case number \_\_\_\_\_, previously dismissed by Judge \_\_\_\_\_

DATE  
NOVEMBER 26, 2007

SIGNATURE OF ATTORNEY OF RECORD

*Dr. Rabbi K. A. Israel*